

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NANOCO TECHNOLOGIES LTD.,

v.

SAMSUNG ELECTRONICS CO., LTD., and
SAMSUNG ELECTRONICS AMERICA,
INC.

Civil Action No. 2:20-cv-00038-JRG

JURY TRIAL DEMANDED

**UNOPPOSED MOTION TO REDACT CONFIDENTIAL INFORMATION FROM
TRANSCRIPT**

Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. respectfully request that the Court order the redaction of the excerpts of the transcript of the August 19, 2022 Pretrial Conferences listed below.

The portions identified below contain descriptions of the terms of the parties' Protected Communications Agreement, which Samsung designated CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY under the Protective Order in this case. *See* Dkt. No. 49.

1. Dkt. No. 258 Pretrial Conference Volume 1

The portions identified below pertain to the parties' confidential discussions subject to one or more non-disclosure agreements, and reference documents marked as CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY.

147:23-24	150:11-18	156:13-20	163:4-5
147:25-148:1	150:25	156:22-157:14	163:10-12

148:2-3	151:3	157:16-158:2	163:17-19
148:4	151:9-152:16	158:3-7	164:3-8
148:7-12	152:18-153:17	160:12-18	164:10-165:24
148:13-15	153:19-154:4	160:19-161:8	166:1-8
148:17-149:11	154:5-155:1	161:10-162:3	166:17-167:10
149:13-19	155:2-7	162:6-14	167:13-18
149:21-150:8	155:9-156:11	162:23-24	168:14-21
168:23-169:3			
169:11-170:8			

2. Dkt. No. 259 - Pretrial Conference Volume 2

The portions identified below pertain to third-party proprietary recipes and operating protocol for the development of quantum dots, marked as CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY by those third parties.

22:13-16
23:7-11
24:11-13

DATED: September 19, 2022

Respectfully submitted,

/s/ Melissa R. Smith

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CERTIFICATE OF CONFERENCE

This is to certify that counsel for the Plaintiff and counsel for the Defendants complied with the meet and confer requirements of Local Rule CV-7 and Plaintiff does not oppose this motion.

/s/ Melissa R. Smith

Melissa R. Smith

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this 19th day of September, 2022.

/s/ Melissa R. Smith

Melissa R. Smith